

1  
2  
3  
4  
5  
6  
7  
8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **OAKLAND DIVISION**

11 Abdi Nazemian, et al.,  
12 Plaintiffs,  
13 vs.

14 NVIDIA Corporation,  
15 Defendant.

16 Andre Dubus III, et al.,  
17 Plaintiffs,  
18 vs.

19 NVIDIA Corporation,  
20 Defendant.

Case No. 4:24-cv-01454-JST (SK)  
Case No. 4:24-cv-02655-JST (SK)

21  
22  
23  
24  
25  
26  
27  
28 **JOINT STIPULATION AND ~~PROPOSED~~**  
**ORDER CONSOLIDATING CASES**

Pursuant to Federal Rule of Civil Procedure 42(a) , Plaintiffs Stewart O’Nan, Abdi Nazemian, Brian Keene, Susan Orlean, Andre Dubus III and Defendant NVIDIA Corporation jointly request that the above captioned actions (the “Actions”) be consolidated for all pretrial and trial proceedings. The parties, by and through their respective counsel of record, hereby stipulate the following:

1. WHEREAS, Plaintiffs Abdi Nazemian, Brian Keene, and Stewart O’Nan filed a Complaint on March 8, 2024 against Defendant NVIDIA Corporation in *Nazemian, et al. v. NVIDIA Corp.*, Case No. 4:24-cv-01454-JST (N.D. Cal. March 8, 2024) (the “*Nazemian Action*”) (*Nazemian Dkt. No. 1*);

2. WHEREAS, on May 2, 2024, Plaintiffs Andre Dubus III and Susan Orlean filed a Complaint against Defendant NVIDIA Corporation in *Dubus, et al., v. NVIDIA Corp.*, Case No. 4:24-cv-02655-JST (N.D. Cal. May 2, 2024) (the “*Dubus Action*”) (*Dubus Dkt. No. 1*);

3. WHEREAS, on May 23, 2024, Plaintiffs filed an Administrative Motion to Consider Whether Cases Should be Related seeking to relate the *Dubus Action* to the *Nazemian Action* (*Nazemian Dkt. No. 37*);

4. WHEREAS, on May 29, 2024, this Court granted the motion and related the *Dubus Action* to the *Nazemian Action* (*Nazemian Dkt. No. 47*; *Dubus Dkt. No. 17*);

5. WHEREAS, on April 29, 2025, NVIDIA filed a motion to consolidate the *Nazemian Action* and *Dubus Action*. *See Nazemian Dkt. No. 135*; *Dubus Dkt. No. 87*.

6. WHEREAS, the parties agree that consolidation of the Actions will advance the just and efficient progress of this litigation (including in ongoing discovery in the Actions), reduce case duplication, conserve Court time and resources, avoid the need to contact parties and witnesses for multiple proceedings, minimize expenditure of time and money for all parties involved, and avoid the risk of inconsistent rulings. *See Fed. R. Civ. P. 42(a)*;

7. WHEREAS, the parties have conferred and agreed that going forward, the *Nazemian Action* and the *Dubus Action* shall be consolidated for all purposes under Federal Rule of Civil Procedure 42(a);

NOW, THEREFORE IT IS HEREBY STIPULATED AND AGREED by and between the Parties and their respective counsel that, subject to the Court’s approval,

1           1. the *Nazemian* Action and the *Dubus* Action shall be consolidated for all purposes under  
2 Federal Rule of Civil Procedure 42(a); and

3           2. the *Nazemian* and *Dubus* Actions shall be maintained under Master File Case No. 4:24-cv-  
4 01454-JST (the “Consolidated Action”); and

5           3. Defendant’s motion to consolidate the *Nazemian* Action (*Nazemian* Dkt. No. 135) and the  
6 *Dubus* Action (*Dubus* Dkt. 87) are denied as moot; and

7           4. Plaintiffs’ counsel shall file a proposal for the appointment of interim lead counsel by June 11,  
8 2025.

1 Dated: May 12, 2025

Respectfully submitted,

2 By: /s/ Joseph R. Saveri

3 Joseph R. Saveri (SBN 130064)  
4 Christopher K.L. Young (SBN 318371)  
5 Evan Creutz (SBN 349728)  
6 Elissa A. Buchanan (SBN 249996)  
7 William Castillo Guardado (SBN 294159)  
8 **JOSEPH SAVERI LAW FIRM, LLP**  
9 601 California Street, Suite 1505  
10 San Francisco, California 94108  
11 Telephone: (415) 500-6800  
12 Facsimile: (415) 395-9940  
13 jsaveri@saverilawfirm.com  
14 cyoung@saverilawfirm.com  
15 ecreutz@saverilawfirm.com  
16 eabuchanan@saverilawfirm.com  
17 wcastillo@saverilawfirm.com

18 Matthew Butterick (SBN 250953)  
19 1920 Hillhurst Avenue, #406  
20 Los Angeles, CA 90027  
21 Telephone: (323) 968-2632  
22 Facsimile: (415) 395-9940  
23 mb@buttericklaw.com

24 Justin A. Nelson (admitted *pro hac vice*)  
25 Alejandra C. Salinas (admitted *pro hac vice*)  
26 **SUSMAN GODFREY L.L.P**  
27 1000 Louisiana Street, Suite 5100  
Houston, TX 77002-5096  
Telephone: (713) 651-9366  
jnelson@susmangodfrey.com  
asalinas@susmangodfrey.com

28 Rohit D. Nath (SBN 316062)  
29 **SUSMAN GODFREY L.L.P**  
30 1900 Avenue of the Stars, Suite 1400  
31 Los Angeles, CA 90067-2906  
32 Telephone: (310) 789-3100  
33 RNath@susmangodfrey.com

34 Elisha Barron (admitted *pro hac vice*)  
35 Craig Smyser (admitted *pro hac vice*)  
36 **SUSMAN GODFREY L.L.P**  
37 One Manhattan West, 51st Floor

New York, NY 10019  
Telephone: (212) 336-8330  
ebarron@susmangodfrey.com  
csmyser@susmangodfrey.com

Jordan W. Connors (admitted *pro hac vice*)  
Trevor D. Nystrom (admitted *pro hac vice*)  
**SUSMAN GODFREY L.L.P**  
401 Union Street, Suite 3000  
Seattle, WA 98101  
Telephone: (206) 516-3880  
jconnors@susmangodfrey.com  
tnystrom@susmangodfrey.com

Rachel J. Geman (pro hac vice)  
Danna Z. Elmasry (pro hac vice)  
**LIEFF CABRASER HEIMANN  
& BERNSTEIN, LLP**  
250 Hudson Street, 8th Floor  
New York, NY 10013  
Tel.: 212.355.9500  
rgeman@lchb.com  
delmasry@lchb.com

Anne B. Shaver  
**LIEFF CABRASER HEIMANN  
& BERNSTEIN, LLP**  
275 Battery Street, 29th Floor  
San Francisco, CA 94111  
Tel.: 415.956.1000  
ashaver@lchb.com

Betsy A. Sugar (pro hac vice)  
**LIEFF CABRASER HEIMANN  
& BERNSTEIN, LLP**  
222 2nd Avenue S. Suite 1640  
Nashville, TN 37201  
Tel.: 615.313.9000  
bsugar@lchb.com

Brian D. Clark (admitted *pro hac vice*)  
Laura M. Matson (admitted *pro hac vice*)  
Arielle Wagner (admitted *pro hac vice*)  
Eura Chang (admitted *pro hac vice*)  
**LOCKRIDGE GRINDAL NAUEN PLLP**  
100 Washington Avenue South, Suite 2200  
Minneapolis, MN 55401  
Telephone: (612)339-6900

Facsimile: (612)339-0981  
bdclark@locklaw.com  
lmmatson@locklaw.com  
aswagner@locklaw.com  
echang@locklaw.com

*Attorneys for the Nazemian Plaintiffs and the Proposed Class*

1 Dated: May 12, 2025

Respectfully submitted,

2 By: /s/ Bryan L. Clobes

3 Bryan L. Clobes (admitted *pro hac vice*)  
4 Alexander J. Sweatman (admitted *pro hac vice*)  
5 Mohammed Rathur (admitted *pro hac vice*)  
6 **CAFFERTY CLOBES MERIWETHER**  
7 **& SPRENGEL LLP**

8 135 South LaSalle Street, Suite 3210  
9 Chicago, IL 60603  
10 Tel: 312-782-4880  
11 bclobes@caffertyclobes.com  
12 asweatman@caffertyclobes.com  
13 mrathur@caffertyclobes.com

14 David A. Straite (admitted *pro hac vice*)  
15 **DiCELLO LEVITT LLP**  
16 485 Lexington Avenue, Suite 1001  
17 New York, NY 10017  
18 Tel. (646) 933-1000  
19 dstraite@dicellolevitt.com

20 Amy E. Keller (admitted *pro hac vice*)  
21 Nada Djordjevic (admitted *pro hac vice*)  
22 James A. Ulwick (admitted *pro hac vice*)  
23 **DiCELLO LEVITT LLP**  
24 Ten North Dearborn Street, Sixth Floor  
25 Chicago, Illinois 60602  
26 Tel. (312) 214-7900  
27 akeller@dicellolevitt.com  
28 ndjordjevic@dicellolevitt.com  
29 julwick@dicellolevitt.com

30 Brian O'Mara (SBN 229737)  
31 **DiCELLO LEVITT LLP**  
32 4747 Executive Drive  
33 San Diego, California 92121  
34 Telephone: (619) 923-3939  
35 Facsimile: (619) 923-4233  
36 briano@dicellolevitt.com

37 *Counsel for the Dubus Plaintiffs and Proposed Class*

1 Dated: May 12, 2025

Respectfully Submitted,

2 By: /s/ Sean S. Pak

3 **QUINN EMANUEL URQUHART &**  
4 **SULLIVAN, LLP**

5 Sean S. Pak (SBN 219032)  
6 seanpak@quinnemanuel.com  
7 50 California Street, 22nd Floor  
8 San Francisco, CA 94111  
9 Telephone: (415) 875-6600  
10 Facsimile: (415) 875-6700

11 Andrew H. Schapiro (admitted *pro hac vice*)  
12 andrewschapiro@quinnemanuel.com  
13 191 N. Wacker Drive, Suite 2700  
14 Chicago, Illinois 60606  
15 Telephone: (312) 705-7400  
16 Facsimile: (312) 705-4001

17 Alex Spiro (admitted *pro hac vice*)  
18 alexspiro@quinnemanuel.com  
19 51 Madison Avenue, 22nd Floor  
20 New York, NY 10010  
21 Telephone: (212) 849-7000  
22 Facsimile: (212) 849-7100

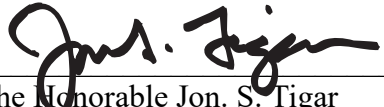
23 *Attorneys for Defendant NVIDIA Corporation*



~~[PROPOSED]~~ ORDER

PURSUANT TO JOINT STIPULATION, IT IS SO ORDERED.

Dated: May 13, 2025

  
\_\_\_\_\_  
The Honorable Jon. S. Tigar  
U.S. District Court Judge